

EXHIBIT 1

Hannah Giles

Vera v. O'Keefe

UNITED STATES DISTRICT COURT
IN AND FOR THE SOUTHERN DISTRICT OF CALIFORNIA

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JUAN CARLOS VERA, an individual, :
Plaintiff, : Case No.
v. : 10-cv-01422-L-JMA
JAMES O'KEEFE, III, an individual, :
HANNA GILES, an individual, and :
DOES 1-20 inclusive, :
Defendants. :
-----x

Videotaped Deposition of HANNAH GILES
Washington, DC
Friday, March 16, 2012
9:37 a.m.

Pages: 1 - 145

Reported by: Alda Mandell, RPR, CRR

1 A No.

2 Q When Breitbart hired you -- well, September
3 he brings up the issue of the job. Did O'Keefe bring
4 up the issue of the idea of working for Breitbart, or
5 did Breitbart approach you himself?

6 A Breitbart approached me himself.

7 Q And did that issue of you working for
8 Breitbart come up when this conversation occurred
9 where you were reluctant to go on television and he
10 was saying it's for the best?

11 A No. We had a conversation about employment
12 sometime later.

13 Q How much later?

14 A I don't know. Two weeks after that. Four
15 weeks after that.

16 Q Tell me about that conversation.

17 A He asked me if I was -- if I was liking
18 journalism school or if I would rather get firsthand
19 experience in the field as a journalist.

20 Q And you said?

21 A I would have to think about it.

22 Q And what was his response?

23 A Fine. No pressure.

24 Q What happened next?

25 A A lot of stuff.

1 A Yes.

2 Q How did it change your life for the worst?

3 A It changed my life. Not for the worst.

4 Just very different. Very different lifestyle.

5 Q How was it different?

6 A There's a difference between going to the
7 beach every day relaxing and then not. Big
8 difference.

9 Q You'd prefer the former and not the latter.

10 A Some days.

11 Q Now, let me go back into some discussion
12 that we had concerning the issue of the job. Where I
13 thought we had left it was that Breitbart said how
14 would you like to get some experience instead of going
15 to journalism school. And you said you would think
16 about it or words to that effect.

17 A Yes.

18 Q Do I have that right?

19 A Yes.

20 Q And then thereafter, what interaction was
21 there between that and the time you actually started
22 working?

23 A Minimal. He -- in I think October, November
24 was when -- you know, during those two months was when
25 they -- when his team solidified the idea that I would

1 come work for them. So not a lot of discussion about
2 it.

3 **Q You said "his team." Who was on his team as**
4 **you understood it?**

5 A Larry Solov.

6 **Q Solov, S-O-L-O-V?**

7 A (Nods)

8 **Q Anyone else?**

9 A No.

10 **Q All right. So you believed that they were**
11 **discussing it or solidifying their plans in October,**
12 **November. And then what happened?**

13 A And then sometime in November I signed the
14 employment agreement.

15 **Q Do you have a copy of that employment**
16 **agreement?**

17 A Somewhere.

18 **Q Still in existence.**

19 A Yes.

20 **Q And the employment agreement was how many**
21 **pages long? Five, six?**

22 A Longer.

23 **Q And it was a contract for you to work for a**
24 **year. Is that right?**

25 A Yes.